



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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5090 3a

May 15, 2006

Curtis Frye
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Draft Work Plan for the Basewide Background Study

Dear Mr. Frye:

Thank you for your letter dated May 9, 2006 where you responded to the EPA comments dated February 9, 2006 on the draft Work Plan for the Basewide Background Study.

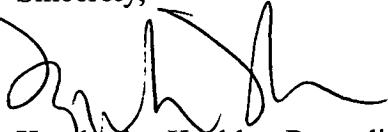
Response 1 indicates the work plan will be revised to clarify subsurface soil as being the 1-10 foot depth range. However, the response suggests that subsurface soil samples will only be collected from a two foot depth, presumably 4-6ft. The sampling program needs to yield results representative of the subsurface 1-10 foot soil conditions. The work plan should specify what action will be taken if bedrock is encountered before the subsurface sampling depth is reached. In addition, boring logs should record the presence of till. Please evaluate whether the sampling depths will collect representative subsurface soil data.

In Response 10, Navy states that a total digestion technique, SW-846, Method 3052, will be used for bedrock analysis. Although methods 3050, 3051 or 3051a are typically used for soil analysis, this analytical method is appropriate. Method 3050 uses a hotplate and nitric and hydrochloric acids, Method 3051 or 3051a, uses a microwave-assisted procedure using either nitric acid or nitric and hydrochloric acids, respectively. Method 3052 is a microwave-assisted treatment that digests a sample in nitric, hydrochloric, and hydrofluoric acids. Because hydrofluoric is one of the reagents for Method 3052, silicate minerals are dissolved, and trace-metal results obtained with Method 3052 are generally significantly higher than those obtained from the same sample material using Methods 3050, 3051, or 3051a.

Please clarify in the work plan that the bedrock results will not, in general, be directly or quantitatively comparable to the soil analytical results, for at least two reasons. One, is a difference in analytical methods, as noted here. The other is the uncertainty introduced by erosion, transport, and re-deposition of glacial materials and the time and length scales involved in these processes (as addressed in Specific Comment and Response 7).

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the base. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kymberlee Keckler', written over a horizontal line.

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA